

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, et al.,

Plaintiffs,

v.

JASON KESSLER, et al.,

Defendants.

No. 3:17-cv-00072-NKM

JURY TRIAL DEMANDED

**DEFENDANT JEFF SCHOEP AND NATIONAL SOCIALIST MOVEMENT'S
PRETRIAL DISCLOSURES PURSUANT TO FED. R. CIV. P. 26(a)(3)**

Comes now, Defendants Jeff Schoep and National Socialist Movement (NSM), by and through counsel, respectfully submits the following disclosures pursuant to Federal Rule of Civil Procedure 26(a)(3) and to the Amended Pretrial Order entered and filed by this Court on July 15, 2021, ECF 991.

Defendants Schoep and NSM intend to admit the following at trial and reserve the right to amend this list in light of new developments before or during trial.

1. FINAL REPORT: Independent Review of the 2017 Protest Events in Charlottesville, Virginia, ("Heaphy Report") by Timothy Heaphy, Hunton & Williams LLP

Respectfully submitted September 14, 2021.

/s/ W. Edward ReBrook, IV

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CERTIFICATE OF SERVICE

I hereby certify that on September 14, 2021, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to all counsel of record in the case, as well as all ECF-registered *pro se* parties.

I hereby further certify that on September 14, 2021, I served a copy of the foregoing on the following non-ECF *pro se* parties, via electronic mail, as follows:

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I hereby further certify that on September 14, 2021, I served a copy of the foregoing on the following non-ECF *pro se* party, via first-class mail, as follows:

Christopher Cantwell (00991-509)
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